

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

GARY RIHN, BONITA RIHN

Plaintiffs

vs.

TYOKA JACKSON

Defendant.

Case No: 4:07CV00197 ERW

DEFENDANT'S MOTION IN LIMINE REGARDING EVIDENTIARY ISSUES

COMES NOW Defendant Tyoka Jackson for his motion in limine regarding the exclusion of certain evidentiary issues requests that the Court exclude any testimony, argument, exhibits, reference or suggestion of the following:

1. The Defendant's net worth or suggestion that the Defendant is a wealthy individual or has significant assets.
2. That the FAA issued a complaint against the Defendant or that the complaint was resolved by Defendant by payment of a lesser amount.
3. Testimony from Dr. Neil Aronov beyond that which Dr. Aronov testified to in his deposition or as is detailed in his medical records regarding the Plaintiff.
4. Any medical treatment or bills for "physical" injuries by the Plaintiff.
5. That airport police detained Defendant or boarded the plane following the incident.

/s/ Thomas J. Magee

Thomas J. Magee, Bar No. 3725
Attorneys for Defendant Tyoka Jackson
MOSER AND MARSALEK, P.C.
200 North Broadway, Suite 700
St. Louis, Missouri 63102-2730
Telephone (314) 421-5364
Facsimile (314) 421-5640
Email: tmagee@moser.com

AND

/s/ N. Scott Rosenblum

N. Scott Rosenblum, Bar No. 4206
Co-Counsel for Defendant Tyoka Jackson
ROSENBLUM, SCHWARTZ & ROGERS, P.C.
120 South Central Ave, Suite 1550
Clayton, Missouri 63105
Telephone (314) 862-4332
Facsimile (314) 862-8050
Email: srosenblum@rsrglaw.com

CERTIFICATE OF SERVICE

I hereby certify that on March 7, 2008, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon the following: ***Douglas P. Dowd***, Attorney for Plaintiffs, 100 N. Broadway, Suite 1600, St. Louis, Missouri 63102.

/s/ Thomas J. Magee

Thomas J. Magee, Bar No. 3725
Attorneys for Defendant Tyoka Jackson
MOSER AND MARSALEK, P.C.
200 North Broadway, Suite 700
St. Louis, Missouri 63102-2730
Telephone (314) 421-5364
Facsimile (314) 421-5640
Email: tmagee@moser.com